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March 4, 2005 P.R.A. DOCKET ROOM

IN RE: BellSouth's Motion For The)
Establishment of a New Performance Plan) Docket No. 04-00150

**COMPSOUTH'S SECOND ROUND OF DISCOVERY
TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

Competitive Carriers of the South ("CompSouth"), hereby serves the following interrogatories to BellSouth Telecommunications, Inc. ("BellSouth").

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.
2. The terms "you" and "your" refer to BellSouth.
3. "CompSouth" means Competitive Carriers of the South its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of CompSouth.
4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the

possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

7. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

8. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

9. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery

requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

GENERAL INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any data request cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. For each data request, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

INTERROGATORIES

1. Referring to page 6 of the Direct Testimony of Alphonso J. Varner, state all facts and identify all documents supporting or relating to the statement “even when BellSouth’s service is as good as, or even better than, the day BellSouth obtained the TRA’s support for Section 271 relief.”

RESPONSE

2. Please provide the amount of Tier 1 penalties paid the month before, the month of, and the month after BellSouth received 271 relief in Tennessee.

RESPONSE

3. Please provide the amount of Tier 1 penalties paid for the 3 most recent months for which data is available.

RESPONSE

4. Referring to page 8 of the Direct Testimony of Alphonso J. Varner, state all facts and identify all documents which demonstrate that BellSouth has been required to engage in “uneconomic behavior to meet the demands of the wholesale requirements.”

RESPONSE

5. Referring to lines 9 and 10 of page 14 of the Direct Testimony of Joseph Thomas, provide copies of all employee training, communications to employees, and methods and procedures directed to employees which instructs BellSouth OSS employees to provide service to CLECs that exceeds parity.

RESPONSE

6. Provide Microsoft Word versions of Exhibit 1, the Tennessee Service Quality Measurement Plan, and Exhibit 3, the Tennessee SEEM Administrative Plan of the Direct Testimony of Alphonso J. Varner.

RESPONSE

7. Please provide the empirical evidence used to justify the statement on page 19, line 2 of the Direct Testimony of Joseph B. Thomas, Ph.D., “First, there are not a sufficient number of cells in 77% of the truncated Z tests.” Specify what data were used, and what analysis was done. In addition, define “a sufficient number of cells” and explain the basis for that definition.

RESPONSE

8. In reference to page 31, lines 4-7 and Exhibit JBT-3 of the direct testimony of Joseph B. Thomas, Ph.D., please specify separately the number of BellSouth retail trouble tickets and the number of BellSouth retail service orders that were retained for potential parity testing calculations in 2004 for the two measures MAD and OCI, respectively.

RESPONSE

9. Please provide in electronic form—either as an Excel spreadsheet or as a comma delimited ascii file—the following data for October to December 2004. For each combination of current Tennessee Tier I parity submeasure and CLEC for which both CLEC and BellSouth data exist, produce one row or record containing each of:

- a. Measure name or code
- b. Submeasure or code, based on the current Tennessee disaggregation
- c. Submeasure description
- d. Submeasure code to which these transactions would be assigned using the disaggregation proposed by BellSouth
- e. CLEC (using a code that is consistent across records with a measure to allow aggregation of submeasures while concealing the identity of individual CLECs)
- f. Number of cells used to compute truncated Z in October 2004.
- g. Number of CLEC transactions used to compute truncated Z in October 2004.
- h. Number of cells used to compute truncated Z in November 2004
- i. Number of CLEC transactions used to compute truncated Z in November 2004
- j. Number of cells used to compute truncated Z in December 2004
- k. Number of CLEC transactions used to compute truncated Z in December 2004

RESPONSE

10. Referring to page 14 of the Direct Testimony of Alphonso J. Varner, provide the submetrics failed by BellSouth during the time it was meeting 82.6 percent of the measures and during the time it was meeting 86 percent of the measures. List the failed submeasures by month and year.

RESPONSE

11. Referring to page 32 of the Direct Testimony of Alphonso J. Varner, state all facts and identify all documents that support the statement that “performance is substantially the same regionwide.”

RESPONSE

12. Referring to page 40 of the Direct Testimony of Alphonso J. Varner, state all facts and identify all documents that support the statement that “when volume is low, the data reported are meaningless from a statistical standpoint.” Describe with specificity the type(s) of volume being referred to, and what quantity constitutes “low volume” and the basis for your position.

RESPONSE

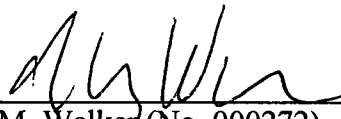
13. Referring to page 56 of the Direct Testimony of Alphonso J. Varner, state the facts and identify all documents that support the statement that “This old fee schedule, designed for and based upon a stale assumption about low CLEC activity, works badly in today’s world of significantly higher CLEC activity.” For each submeasure, describe what BellSouth believes

constitutes "low CLEC activity" and what constitutes "high CLEC activity." For each submeasure, specify whether BellSouth believes the current CLEC activity is high or low.

RESPONSE

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry M. Walker (No. 000272)
1600 Division Street, Suite 700
P.O. Box 340025
Nashville, Tennessee 37203
(615) 252-2363

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being forwarded via U.S. mail, postage prepaid, to:

Guy Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street
Nashville, TN 37201-3300

on this the 4th day of March, 2004.



Henry M. Walker